

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA**

DALTON HICKMAN,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
GEICO GENERAL INSURANCE COMPANY,	)	Case No. CIV-16-63-FHS
	)	The Honorable Frank H. Seay
Defendant.	)	

**JOINT MOTION FOR ENTRY OF STIPULATED  
CONFIDENTIALITY AGREEMENT AND PROTECTIVE ORDER**

Plaintiff, Dalton Hickman, and Defendant, GEICO General Insurance Company (“GEICO”), by and through their undersigned counsel, pursuant to Fed. R. Civ. P. 26(c), respectfully move the Court to enter the agreed Stipulated Confidentiality Agreement and Protective Order attached hereto as **EXHIBIT 1** because confidential and proprietary information and documents are being sought in discovery . In further support of their Motion, the Court is advised as follows.

1. As part of discovery already initiated by Plaintiff documentation and information related to the following categories are being requested:

- A. confidential personnel information;
- B. policy and procedure manuals and/or guidelines related to the handling of UM/UIM claims, training materials, trade secrets;
- C. proprietary information regarding Defendant’s employees, business and operations; and
- D. other information which may be “Confidential”.

2. The information and/or documents identified in Paragraph 1 are considered sensitive and confidential by the Parties.

3. The proposed Stipulated Confidentiality Agreement and Protective Order attached as **EXHIBIT 1** limits the scope and categories of information that may be designated as “Confidential”.

4. Said Stipulated Confidentiality Agreement and Protective Order would protect the Parties and further the ends of justice by allowing extensive discovery without imposing unreasonable restraints on the Parties or unfairly limiting access by the public.

5. The Parties’ ability to prosecute and defend this action would not be unreasonably limited by entry of said Stipulated Confidentiality Agreement and Protective Order.

WHEREFORE, the Parties respectfully request the Court grant this Motion and enter the Stipulated Confidentiality Agreement and Protective Order attached as **EXHIBIT 1**.

Respectfully submitted,

s/ Charles Weddle

*(Signed by filing attorney with permission)*

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